

## Report and Suggestions from IPEDS Technical Review Panel #50: Outcome Measures 2017-18: New Data Collection Considerations

**SUMMARY:** The Technical Review Panel considered a number of potential changes to the Outcome Measures survey component regarding data on Pell Grant recipients. This summary provides feedback on how changes would affect data quality and reporting burden for institutions. Comments from interested parties are due to Janice Kelly-Reid, IPEDS Project Director at RTI International, at [ipedstrpcomment@rti.org](mailto:ipedstrpcomment@rti.org) by October 12, 2016.

On August 23 and 24, 2016, RTI International, the contractor for the Integrated Postsecondary Education Data System (IPEDS) web-based data collection system, convened a meeting of the IPEDS Technical Review Panel (TRP) in Washington, DC. Meetings of the IPEDS TRP are conducted by RTI to solicit expert discussion and suggestions on a broad range of issues related to postsecondary education and the conduct of IPEDS. The TRP is designed to allow the public to advise and work with RTI to improve IPEDS data collection and products, data quality, and user-friendliness. The TRP does not report to or advise the Department of Education.

RTI's specific purpose for TRP 50 was to discuss potential changes to the Outcome Measures (OM) survey component and the impact of the changes to institutions, researchers, and the Department of Education. The panel consisted of 53 individuals representing institutions, researchers, state governments, the federal government, higher education associations, and other experts.

### Background

The National Center for Education Statistics (NCES) requested clearance from the Office of Management and Budget (OMB) for the 2016-17, 2017-18, and 2018-19 IPEDS data collections. The clearance package included a number of proposed changes. Starting with 2017-18 data collection, NCES proposed to begin collecting outcome information on Pell Grant recipients. The federal Pell Grant program promotes access to postsecondary education by helping the neediest qualified undergraduate students. For many students, Pell Grants provide a foundation of financial aid to which other aid (from federal and nonfederal sources) may be added. In 2014-15, the Pell Grant program provided grants ranging from \$587 to \$5,730 to more than 8.3 million students, with awards totaling over \$30.6 billion.<sup>1</sup> The U.S. Department of Education needs reliable and complete information on the federal investment of the Pell Grant program; however, institution-level data on enrollment and completion for all Pell Grant recipients are not currently available in federal data systems.

**IPEDS Outcome Measures (OM) component.** NCES proposed adding a fifth cohort of Pell Grant recipients beginning with the 2017-18 collection year. (See sidebar on page 2 for background and purpose of the OM component.) The fifth cohort of Pell Grant recipients would be drawn and reported from the four OM cohorts of entering students. As with the other four OM cohorts, institutions would retrospectively report on the award and enrollment status of the Pell Grant recipient cohort at 6 and 8 years after the cohort enters the institution. The addition of the fifth Pell Grant cohort would provide a basic programmatic measure of an institution's completion rate for Pell Grant recipients at 6 and 8 years.

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<sup>1</sup> 2014-2015 Federal Grant Program End-of-Year Report, retrieved from <http://www2.ed.gov/finaid/prof/resources/data/pell-2014-15/pell-eoy-2014-15.html>

**Graduation Rates (GR) component.** Starting with the 2016-17 data collection, NCES will begin collecting graduation rates for two new cohorts: Pell Grant recipients<sup>2</sup> and recipients of a subsidized Stafford Loan who did not receive a Pell Grant. Specifically, the GR component will collect the number of students, exclusions, and completers within 150 percent of normal time to completion for full-time, first-time (FTFT) cohorts of Pell Grant recipients and subsidized Stafford Loan recipients who did not receive a Pell Grant. Because institutions are currently required to disclose this information on their websites,<sup>3</sup> the addition of these cohorts will collect the HEA disclosure completion rates and make them publicly available in a central location.

RTI convened this TRP to engage the higher education community in a discussion about additional changes to collect information about the outcomes of Pell Grant recipients proposed by the public during the OMB public comment period. To this end, the panel was asked to review and provide feedback on the most important and feasible changes to the OM component to implement for 2017-18. Background on this topic was informed by comments received during the OMB 60-day public comment period (81 Fed. Reg. 8,181 [February 18, 2016]).

### **Proposed Change #1: All Institutions Report OM Data**

In aid year 2013-14, degree-granting institutions enrolled nearly 7 million Pell Grant recipients, with Pell Grant awards totaling \$27.6 billion. Non-degree-granting institutions enrolled more than 436,000 Pell Grant recipients, with Pell Grant awards totaling \$1.7 billion.<sup>4</sup> Although both degree-granting and non-degree-granting institutions serve Pell Grant recipients, only degree-granting institutions are required to complete the OM component. The panel discussed whether all institutions that report to IPEDS should be required to complete the OM component. Panelists weighed the benefits of having OM data from all institutions with the burden incurred by approximately 2,600 non-degree-granting institutions<sup>5</sup> that do not currently report OM data.

**Coverage.** With the federal investment in Pell at \$30.6 billion, it is important to obtain additional information about the institutions that educate this vulnerable population. Although non-degree-granting institutions account for a fraction of the nation's enrollment, panelists recognized the need for more complete coverage of all institutions and agreed that the lack of [required] participation by federally funded institutions that enroll Pell Grant

### **IPEDS OM Component**

**Background:** The OM component, first collected in the IPEDS 2015-16 collection year, was developed in response to recommendations from the 2012 Committee on Measures of Student Success report to the Secretary of U.S. Department of Education and was informed by the outcome and public comments from previous TRPs (i.e., TRP #24, TRP #37, TRP #40, and TRP #45).

**Purpose:** The OM component is designed to improve the quality and availability of student success data by making more comprehensive data available for student outcomes on an expanded group of students beyond the statutorily defined Graduation Rates cohort of traditional full-time, first-time degree/certificate-seeking undergraduate students. More specifically, this component collects data from degree-granting institutions on four cohorts of entering degree/certificate-seeking undergraduate students:

- Full-time, first-time
- Part-time, first-time
- Full-time, non-first-time
- Part-time, non-first-time

For each of the four cohorts, the OM component collects the status update at 8 years after the cohort enters the institution, with award and/or enrollment information collected for at the 6-year and 8-year time points.

Notes: The Committee's final report is available at the following link:  
<http://www2.ed.gov/about/bdscomm/list/cmss-committee-report-final.pdf>  
TRP meeting summaries are posted online:  
[https://edsurveys.rti.org/IPEDS\\_TRP/Default.aspx](https://edsurveys.rti.org/IPEDS_TRP/Default.aspx)

<sup>2</sup> For the GR component, a recipient is a student who receives and uses that award upon their entry into the institution.

<sup>3</sup> *Higher Education Opportunity Act* of 2008, Sec. 488(a)(3).

<sup>4</sup> Source: IPEDS Student Financial Aid survey component, 2014-15.

<sup>5</sup> Source: IPEDS Institutional Characteristics 2015.

recipients would be cause for concern. Requiring non-degree-granting institutions to complete OM would hold all institutions to a uniform reporting standard and give a more complete and comparable picture of how student outcomes differ at all institutions, including those that do not award degrees.

**Consumer, research, and policy needs.** Given the increased demands for transparency around student outcomes, having OM data from all institutions (degree-granting and non-degree-granting) is necessary to answer policy and research questions about how students access, progress, and succeed in postsecondary education. Institution-level data on Pell Grant recipient outcomes from all institutions would allow for global measures on the federal Pell Grant program and encourage similar analyses at the institutional level on how Pell Grant recipients are served by their respective institutions. Such data would also help consumers make informed decisions in choosing a college.

**Burden.** Panelists noted that non-degree-granting institutions already report information on student outcomes to their accrediting agency, so reporting to IPEDS should not pose a significant burden. However, panelists questioned whether smaller, under-resourced institutions have the capacity to recreate cohorts and report on student outcomes retrospectively. RTI encourages additional comments on this topic, particularly with respect to burden on affected institutions.

**Data Quality.** Panelists acknowledged that the entering cohorts would be very small at non-degree-granting institutions and expressed concern about potentially unreliable data due to both small cohort sizes and duplication of first-time students within the counts. Non-degree-granting institutions, which tend to have annual cohorts, typically do not accept transfer credit or authenticate previous postsecondary experience. Panelists noted potential small size issues, particularly if the cohorts are further disaggregated.

**Implementation for 2017-18.** Panelists did not see a compelling reason to justify the exemption of non-degree-granting institutions from OM reporting. If non-degree-granting institutions are required to report the OM component, IPEDS should phase in reporting after the 2017-18 IPEDS data collection to allow these institutions the time to recreate the cohorts.

**Alternate suggestion.** A review of enrollment data shows non-degree-granting institutions would be most affected by reporting outcome data for entering first-time students. In 2014, approximately 80 percent of entering first-time students at these institutions were enrolled full-time.<sup>6</sup> Panelists pointed out that the disclosure completion rates collected in the GR component cover the majority of entering students at non-degree-granting institutions; data on non-first-time entering students would likely be reported in cells too small to disclose for privacy reasons. Given the relatively small difference in results compared with the potential burden, panelists noted the disclosure completion rate would provide a comparable institution-level view of data and could replace OM reporting for non-degree-granting institutions for full-time, first-time entering students or could be used as a substitute during the phased-in reporting period.

### **Purpose and Intended Use of Institution-Level Data on Pell Grant Recipient Outcomes**

As conversations move from access to completions and accountability, a discussion unfolded between collecting institution-level data on Pell Grant recipients to understand how outcomes differ at all institutions and using this data to assess the effectiveness of the Pell Grant program. Panelists noted that having a clear understanding about the intent and purpose of the data to be collected would help guide suggestions for potential changes to the OM component. For example, is the goal to answer questions about how Pell Grant recipients perform within and across institutions relative to

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<sup>6</sup> Source: IPEDS Fall Enrollment 2014. Certificate-seeking students entering U.S. Title IV non-degree-granting, primarily postsecondary institutions.

non-Pell Grant recipients? Or is it to measure institutional effectiveness, improve institutional accountability for the success of low-income students, and measure the enrollment and completion outcomes for Pell Grant recipients?

Panelists noted concerns about the unintended consequences of using institution-level data on the outcomes of Pell Grant recipients. Although the broad representation of all institutions would allow for global measures on the enrollment and progression of Pell Grant recipients, panelists felt that IPEDS could not adequately address the complexity of assessing the performance of the Pell Grant program—nor would IPEDS be the appropriate mechanism to undertake such an endeavor. There were also concerns that once the data are in the public domain they would also be used to facilitate other types of analysis or comparisons, such as performance-centric measures, or be misused and lead to questionable assumptions. For example, panelists noted that Pell Grant recipient graduation rates may be inaccurate reflections of overall performance of low-income students. Because these efforts may be [mis]used to eliminate the Pell Grant program overall or for specific groups of institutions or students, considerations to ensure that IPEDS data on Pell Grant recipient outcomes are accurately collected and disseminated become especially salient, particularly if they might be used in accountability models.

### **Proposed Change #2: All Institutions Report on OM Data on a Full-Year Cohort**

Institutions currently report OM data on entering student cohorts based on their predominant calendar system.

- Institutions primarily following an academic year–based calendar (semesters, trimesters, quarters, or 4-1-4 plan) are “academic reporters” and report on fall cohorts of entering degree/certificate-seeking undergraduate students based on a snapshot date of either October 15 or the official institutional fall census date.
- Program reporters and hybrid institutions<sup>7</sup> follow a program-based or continuous enrollment calendar system (nonstandard academic terms); these institutions report on full-year cohorts of entering degree/certificate-seeking undergraduate students enrolled at any time within the period September 1 through August 31.

Academic reporters on a fall snapshot date exclude students who enroll outside of the traditional fall term, which makes comparing data with program reporters and hybrid institutions impossible because of the census date. Data users and the Committee for Alternative Measures of Student Success have called for more complete measures of student outcomes based on all entering students. The panel considered changing the reporting time frame for academic reporters to the program year, meaning these institutions would begin reporting OM data for all students who enrolled at any point during the year. Panelists examined whether comparability and completeness of data would justify the loss of integration with the Fall Enrollment (EF) and GR components.

**Coverage.** This proposed change would align the cohort coverage for all institutions and capture all cohort-eligible students who enter an institution at any point during the year. For academic reporter institutions that enroll more nontraditional students, the full-year cohort would better reflect the population of entering students. Moving to a full-year cohort might also mitigate concerns about some institutions delaying enrollment of at-risk students to terms not included in the cohort definition to inflate completion rates.

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<sup>7</sup> Hybrid institutions are those that offer programs with term-based cost of attendance (like an academic reporter) but enroll students throughout the year (like a program reporter).

**Burden.** The approximately 4,000 academic reporters that report on fall cohorts would experience an increase in burden as a result of this change. For these institutions, the initial cohort data for OM reporting is preloaded from the EF and GR components. Moving to a full-year cohort would result in a loss of integration with these survey components. This change would require academic reporters to track and report data on one set of entering cohorts for OM reporting and a different set of statutorily defined cohorts for GR reporting. The burden on affected institutions would be compounded should the OM cohorts be further disaggregated.

**Multiple completion rates.** Collecting outcomes of Pell Grant recipients in OM using a different methodology than for GR would produce multiple measures based on similar (but differently defined) cohorts; the existence of multiple completion rates could contribute to confusion and misinterpretation by the public

**Heterogeneous cohorts.** Although reporting on a full-year cohort would seemingly align with data users' goal to count all students, panelists noted that students who start outside of the fall term at traditional institutions (where a majority of the students enroll by the fall census date) are a distinct student population with different enrollment patterns.

**Enrollment status changes.** If no census date is used, how should institutions account for students in the cohorts who change enrollment status (from part-time to full-time or full-time to part-time) during the 12-month time frame? Panel members were also concerned about duplication—students who are cross-enrolled at multiple institutions or transfer during the 12-month time frame would be counted in the cohort for each institution.

**Implementation for 2017-18.** Given the limitations and concerns above, panelists did not feel that academic reporters should move to full-year reporting at this time. This proposed change can be delayed.

### **Proposed Change #3: Report Pell at Entry**

The Pell Grant recipient cohort can be defined as students who entered into an OM cohort and received a Pell Grant in their first year (“Pell at entry”) or can be more broadly defined as students who entered into an OM cohort and received a Pell Grant at any time during their enrollment at the reporting institution (“Pell ever”). NCES originally proposed using Pell ever—or more specifically, Pell at any point throughout the 8-year measurement period—to identify Pell recipients for OM reporting. However, given that the disclosure completion rates collected in GR are based on status at entry, the panel considered applying the same definition to OM cohorts—to also collect Pell at entry.

**Coverage.** Panelists acknowledged that collecting Pell at entry would undercount the number of Pell Grant recipients during the 8-year period, meaning students who did not receive a Pell Grant in their first year of enrollment but were recipients in their successive years would not be included in the OM measures. Although Pell ever is a more inclusive definition and would provide more holistic information (e.g., students who become low-income after their first year, students who re-enroll with Pell, students who may be on the cusp of Pell eligibility at entry and receive Pell for part of the 8-year measurement but not all of it), panelists noted that reporting Pell at entry would provide a better measure of social capital at entry and facilitate better comparisons.

**Consistency.** As noted, defining Pell at entry would be consistent with federally required institutional disclosures; applying the same definition to OM cohorts would manage the burden by aligning with how institutions already report. However, differences in the cohorts would not be obvious to data users—if institutions begin reporting on a Pell ever cohort for the OM component, data users may be confused by this change or may fail to recognize it when comparing the two rates.

**Burden.** Creating Pell cohorts would require IPEDS keyholders to coordinate with their financial aid offices. Retrieving data from financial aid offices for retrospective reporting at the 8-year mark may be difficult, particularly if the cohort is defined as Pell ever. Defining the cohort as Pell ever could delay reporting until after the full measurement time period (8 years); furthermore, using a different definition from that in the disclosure requirements would require institutions to redefine Pell recipients in their data collection and enrollment systems in order to assign them to a cohort. Institutions without enterprise resource planning systems would have to define the cohorts using separate enrollment and financial aid systems (or possibly multiple financial aid systems). A panelist noted that financial aid records are audited every three years by the National Student Loan Data System (NSLDS); such an audit could cause complications for institutions that do not have access to the reports.

**Data quality.** Most attrition happens early in a student's college enrollment; defining Pell ever would bias the statistic higher, calling into question the utility of the resulting metrics. For example, the Pell ever definition would include dependent students who remain enrolled for 8 years and age out of dependency status while enrolled, making them more likely to be Pell-eligible in later years.

**Metric across IPEDS.** Panelists raised concerns with using Pell awarded or Pell disbursed to define the Pell cohort for OM purposes. The Student Financial Aid component instructs institutions to report on grant aid awarded to students. This may be different from aid that was actually disbursed to students. The revised OM component would define the cohort as Pell disbursed; panelists pointed out that Pell disbursed would vary by institutions with different calendar reporting. Panelists noted that many institutions have internal definitions as well.

**Implementation for 2017-18.** Panelists agreed that Pell at entry is statistically valid and would eliminate concerns about survivor bias. Using Pell at entry would be consistent with other elements in IPEDS that define the cohort at the time of entry (e.g., attendance status, degree/certificate-seeking status, enrollment intensity, race/ethnicity, and gender). The collection of Pell data is feasible for the 2017-18 data collection if defined as Pell at entry at the IPEDS reporting institution. This is a high-priority item for 2017-18. If this proposed change is implemented, IPEDS should be deliberate in how students are excluded from the measure (i.e., be clear that Pell at entry means Pell in the student's first year).

#### **Proposed Change #4: Report Pell Subcohorts**

Grouping Pell Grant recipients into a single cohort that combines attendance level (full-time and part-time) and postsecondary experience (first-time and non-first-time) would limit the ability to compare outcomes between Pell Grant recipients and non-Pell Grant recipients or compare across institutions. To address limitations of the original proposed approach, the panel considered adding Pell subgroup cohorts for each of the four OM cohorts.

**Accounts for disparate groups.** Panelists noted that breaking out Pell Grant recipients for each of the four OM cohorts would allow for a more nuanced analysis of the data and facilitate more meaningful comparisons across institutions, as well as for Pell and non-Pell recipient outcomes.

**Small cell size issues.** Panelists acknowledged that collecting four subgroup cohorts may result in small cell sizes, but as with other elements in the IPEDS data collection (e.g., race/ethnicity), small cell sizes will occur. Given the demonstrated need for Pell recipient subgroup cohorts, concerns about potential small cell size issues do not provide adequate justification for not moving forward with this proposed change. Panelists suggested that IPEDS suppress data, rather than pool cohorts, if small cell sizes become an issue for privacy reasons. A panelist also noted that unlike personal identifying characteristics like race/ethnicity and sex receiving a Pell Grant is not observable and there may not be privacy issues.

**Burden.** Panelists agreed that the added burden of tracking and reporting students in the subcohort breakouts would be offset by the benefits of the additional detail gained by collecting such information. However, burden may be impacted significantly by decisions on proposed change #2 (full-year reporting for academic reporters) and proposed change #3 (Pell at entry versus Pell ever).

**Implementation for 2017-18.** Panelists supported this proposed change and agreed that reporting on the four OM cohorts disaggregated by Pell status would yield more meaningful and comprehensive data. This change is feasible for 2017-18 if there is no change to the reporting time frame for academic reporters (proposed change #2) and if Pell recipients are defined as those who receive Pell at entry (proposed change #3). This is a high-priority item for 2017-18.

**Alternate Suggestion—Report Pell subcohorts at year 1 and years 2 through 8.** Panelists considered building upon the Pell subgroup cohorts discussed earlier by breaking out Pell status by (1) non-Pell recipients; (2) Pell recipients at entry (Pell year 1); (3) subsequent Pell recipients (Pell years 2 through 8 but not year 1). This model would capture both Pell at entry and Pell ever and would address concerns about survivor bias while also providing more complete coverage. Panelists noted the significant burden in terms of gathering the data needed to report and the high risk of misinterpretation of the resulting data. The burden would be further compounded with any disaggregation of award status. This model faces the same limitations with defining Pell ever described in the discussion of Proposed Change #3.

### **Proposed Change #5: Report Data by Award Level and Pell Cohorts, Report Data at the 4-Year Award Status, and Streamline GR200 into OM**

The OM component does not currently make a distinction between award level (i.e., certificate, associate's degree, or bachelor's degree). Institutions report award status at 6 and 8 years after entry and are instructed to report on the first award (not the highest) received by the student. The 2016 IPEDS quality control process for the first year of OM collection (2015-16) revealed that a sizeable number of institutions' OM 8-year FTFT rates did not match closely with Graduation Rates 200% (GR200) rates reported for the same cohort. Streamlining the GR200 component into the OM component would remove the duplication of reporting (i.e., by eliminating GR200), alleviate the need to match rates, and allow for the collection of award level sought. However, this would require adding a cohort status report at 4 years to the OM component (to be reported 8 years after the cohort enters the institution) to accommodate the measurement of completions and exclusions in a time frame that aligns with the requirements of HEOA. [Note that IPEDS does not make the distinction of 200% of normal time for certificates on GR200.] Institutions would report on award status at 4 and 6 years and award and enrollment status at 8 years. Panelists noted that award status at 4, 6, and 8 years should be mutually exclusive (i.e., report each student only once by highest award level earned at that time).

**Report by award sought.** Break out each of the eight Pell subgroups (i.e., the four OM components broken out by Pell Grant recipients and non-Pell Grant recipients) by award sought: (1) bachelor's or equivalent degree-seeking, (2) associate's-seeking, and (3) certificate-seeking. The award level breakouts would be consistent with several voluntary data initiatives—including the Student Achievement Measure, Complete College America, and Access to Success—that separate cohorts based on credential-seeking status. Panelists noted that institutions report similar award-level data based on student intent to the NSLDS and in the GR component (4-year institutions distinguish bachelor's degree-seeking students from other degree/certificate-seeking students).

While there is a high level of interest in having more detailed information about paths to degree, panelists were concerned that reporting detailed cohort by award-level intent (i.e., certificate, associate's, bachelor's) would not be reliable for several reasons—student intent at entry may be

unknown, unrealistic, or change; some institutions do not collect intent at entry; institutions with missions to prepare students for transfer would assign students to a level (e.g., all students as associate's degree-seeking) that may not match actual intent; and this approach is susceptible to gaming (e.g., coding students whose intent is unknown into less-demanding programs to increase outcome rates).

**Report by award earned.** Break out each award status (i.e., award status at 4, 6, and 8 years), by award level: (1) bachelor's or equivalent, (2) associate's, and (3) certificates. Institutions would be instructed to report on the highest award (not the first) received by the student at that point in time at that institution. For OM purposes, certificates refers to undergraduate certificates as defined in the IPEDS Completion component. OM cohorts would not be reported by award sought and thus could not replace the GR200 component.

Panelists noted that reporting by award earned would provide the most added value and lead to less confusion, while at the same time aligning with voluntary data initiatives. However, there were concerns about how various state award procedures would impact the reporting of credentials (e.g., some states require public institutions to report certificates awarded after credit accumulation milestones regardless of a student's intent to seek a certificate).

**Report awards sought and earned.** Report detail for both award level sought and award level earned. Break out each of the eight Pell subgroups (i.e., the four OM components broken out by Pell Grant recipients and non-Pell Grant recipients) by award sought: (1) bachelor's or equivalent degree-seeking, (2) associate's-seeking, and (3) certificate-seeking. Then break out each award status (i.e., award status at 4, 6, and 8 years) by award level: (1) bachelor's or equivalent, (2) associate's, and (3) certificates. This approach would essentially provide a matrix on how award sought and award earned intersect.

This reporting faces the same limitations as the previous two options discussed. Panelists raised additional concerns that reporting OM data by award sought and award earned would add substantial burden with little value.

**Implementation for 2017-18.** Given the limitations and concerns above, further study is needed on the most appropriate way to capture data on awards in the OM component. This proposed change can be delayed.

## Next Steps

Once the TRP summary comment period has closed, RTI will review the comments and outline recommendations for NCES based on the outcome of the TRP meeting and subsequent public comment period. NCES will review the recommendations and submit a clearance request to OMB in the fall of 2016 for any proposed amendments to the OM component for 2017-18, which will be announced in the *Federal Register* for a 60-day public comment period. NCES will then submit an updated clearance request to OMB before December 2016 when the *Federal Register* announces the final 30-day comment period.

## Comments

RTI is committed to improving the quality and usefulness of IPEDS data as well as strategies that might be helpful in minimizing additional reporting burden. We encourage interested parties to send any comments or concerns about this topic to Janice Kelly-Reid, IPEDS Project Director, at [ipedsTRPcomment@rti.org](mailto:ipedsTRPcomment@rti.org) by October 12, 2016.